

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|---------------------------|
| Actava TV, Inc., Master Call Communications, Inc., |) | |
| Master Call Corporation, and Rouslan Tsoutiev, |) | |
| |) | Index No.: 1:18-cv-06626 |
| Plaintiffs, |) | (ALC/KNF) |
| |) | |
| -against- |) | |
| |) | [PROPOSED] AMENDED |
| Joint Stock Company "Channel One Russia Worldwide," |) | SCHEDULING |
| Closed Joint Stock Company "CTC Network," Closed |) | <u>ORDER NO. 5</u> |
| Joint Stock Company "New Channel", Limited Liability |) | |
| Company "Rain TV-Channel," Open Joint Stock |) | |
| Company "ACCEPT", and Limited Liability Company |) | |
| "Comedy TV," and Kartina Digital GmbH, |) | |
| |) | |
| Defendants. |) | |

Counsel for Plaintiffs and Defendants jointly submit the following amended case management plan and scheduling order, which the parties propose should supersede the Amended Scheduling Order (ECF No. 125) entered by the Court on October 25, 2019:

1. This case is to be tried to a jury.
2. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) were exchanged on February 22, 2019 by Plaintiffs, and on March 6, 2019 by Defendants.
3. No additional parties may be joined except with leave of the Court.
4. Amended pleadings may not be filed except with leave of the Court.
5. All fact discovery shall be completed on or before **March 6, 2019**.
6. Plaintiffs served initial requests for production of documents and interrogatories on November 1, 2018; and Defendants served initial requests for production of documents and interrogatories on January 18, 2019.
7. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim

deadlines may be extended by the parties on consent without application to the Court, provided that the parties meet the deadline for completing fact discovery set forth in Paragraph 5 above.

- a. Depositions shall be completed by **March 6, 2020**.
 - i. There is no priority in deposition by reason of a party's status as a plaintiff or a defendant.
 - ii. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.
- b. Requests to Admit shall be served no later than **March 25, 2019**.
- c. The designation of Plaintiff's expert(s) shall be completed by **March 16, 2020**, followed by the designation of the Defendant's rebuttal expert(s) by **March 23, 2019**.
- d. The Initial Report(s) of Plaintiff's expert(s) shall be completed by **April 3, 2019**, followed by the Defendant's expert(s)' rebuttal report(s) by **April 27, 2019** and Plaintiff expert's reply report by **May 5, 2019**.
- e. Expert depositions shall be completed by **May 21, 2019**.
- f. All discovery shall be completed by **May 21, 2019**.

8. This Court will conduct a telephonic status conference on _____ at _____. Counsel to Plaintiffs shall initiate the telephonic conference.

Dated: New York, New York
December ____, 2019

SO ORDERED:

KEVIN NATHANIEL FOX
UNITED STATES MAGISTRATE JUDGE